

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC

130 Clinton Road, Lobby B, Suite 202

Fairfield, NJ 07004

Telephone: 973-575-0707

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Attorneys for Secured Creditor

Shauna Deluca, Esq. (SD-8248)

In Re:

Fabian Oneal Brown,

Debtor.

Case No.: 19-28922-SLM

Chapter: 13

Hearing Date: July 8th, 2020

Judge: Stacey L. Meisel

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:

July 8th, 2020 at 10:00 A.M.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor-</i> Fabian Oneal Brown 276 Prospect Street, Apt 3G East Orange, NJ 07017	<i>Trustee-</i> Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004	<i>U.S. Trustee-</i> US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
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PLEASE TAKE NOTICE that on July 8th, 2020, at 10:00 a.m., or as soon thereafter as counsel may be heard, RAS CITRON, LLC, attorneys for PHH Mortgage Corporation as servicer for U.S. Bank National Association, as Trustee for Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2006-W1, the within creditor ("Creditor"), shall move before the Honorable Stacey L. Meisel, United States Bankruptcy Judge, at 50 Walnut Street, 3rd Floor, Newark, N.J. 07102, Courtroom 3A, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from the automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102**, and simultaneously served on Secured Creditor's counsel, **RAS CITRON, LLC, 130 Clinton Road, Suite 202, Fairfield, New Jersey 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: June 9, 2020

RAS Citron, LLC

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By: /s/ Shauna Deluca

Shauna Deluca, Esquire

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